



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER EL PASO

Operating Policy and Procedure

HSCEP OP: 73.15, Minors in Research Laboratories

PURPOSE: The purpose of this Texas Tech Health Sciences Center El Paso (TTUHSCEP) Operating Policy and Procedure (HSCEP OP) is to provide guidance and assistance in the proper placement of minors in TTUHSCEP research laboratories or other research areas for the purpose of work, study, or other TTUHSCEP approved special programs and activities. For the purposes of this policy, a **minor is defined as an individual under the age of 18 years** who may be an employee (including student employees), student, or visitor (including a volunteer or guest of the institution). The TTUHSCEP has a responsibility to maintain a safe environment for its employees, students, patients, and visitors, some of whom may be minors.

REVIEW: This HSCEP OP will be reviewed by June 1 of each odd-numbered year (ONY) by the Director of Safety Services or designee and the Assistant Vice President for Human Resources or designee, with recommendations for revision submitted to the Vice President for Research (VPR) or designee by June 30.

POLICY/PROCEDURE:

1. Age Restrictions.

- a. Underage (minor) individuals often seek and acquire opportunities to study or work under the sponsorship of the TTUHSCEP or other sponsored educational programs. For safety reasons, the TTUHSCEP has established age restrictions for minors seeking to learn, volunteer, or work in laboratory areas. No minor (including children of TTUHSCEP faculty or staff) is allowed in a TTUHSCEP laboratory, except in accordance with this policy.
- b. Minors below the age of 16 years. Minors below the age of 16 years are **not** eligible for laboratory study or work experiences, or allowed to enter research laboratories or other hazardous work areas at the TTUHSCEP.
- c. Minors of age 16 and 17 years. Minors of age 16 and 17 years may participate, if authorized in accordance with section 3 below, in laboratory study or work experiences that do not include work in areas or occupations considered to be "particularly hazardous" as defined in 29 CFR 570, "Child Labor Regulations, Orders and Statements of Interpretation," or that may be considered to be detrimental to their health or well-being, including, but not limited to, the following:
 - (1) Any work in any workroom where ionizing radioactive materials or ionizing radiation-producing devices are present or used;
 - (2) Any work in any workroom in which the following conditions may exist:
 - A. Potential presence or use of "highly hazardous" biological or chemical materials as defined by the TTUHSCEP Institutional Biosafety Committee (IBC);
 - B. Potential presence of infectious diseases transmitted by an aerosol route;
 - C. Potential exposures to human blood, body fluids, tissues, or animals with

infections potentially transmissible to humans;

- D. Potential exposures to Risk Group 2, 3 or 4 biological agents and/or agents that required BSL3 or 4 containment (as defined by the Centers for Disease Control and Prevention, CDC);
 - E. Potential exposures to Hazard Category 1 or 2 chemicals (as defined by the Hazardous Material Identification System (HMIS) or National Fire Protection Association (NFPA) System);
 - F. Potential use of open lasers or open laser devices;
 - G. Hazards requiring special protective wear (not including latex or vinyl gloves or lab coat);
 - H. Potential presence or use of controlled substances;
 - I. Potential presence or use of select agents (as defined by the CDC) or Health and Human Services toxins in permissible amounts;
 - J. Work in an area where there is a known risk of exposure to contagious diseases of human or animal origin; and
 - K. Work in any animal facility.
- c. Individuals 18 years of age or older. There are no age-related restrictions on individuals of age 18 years or older.

2. **Operational Responsibilities**

- a. Minors shall be closely and directly supervised by the sponsoring investigator.
- b. Minors shall be provided with adequate and appropriate personal protective equipment.
- c. Minors shall successfully complete all required laboratory training, as appropriate, and any site-specific training required by the sponsoring laboratory prior to commencing work activities.
- d. Under no circumstances will minors be allowed to work or study with or around research materials in manners that pose a risk to their health or well-being.
- e. Supervisors overseeing hazardous work areas or laboratories are specifically responsible for the safety of all minors who are approved under institutional guidelines as employees, students, or visitors in their areas, and for compliance with this policy.

3. **Authorization**

- a. A parent or guardian must give written consent for minors of ages 16 and 17 to participate in laboratory study or work experiences, unless the minor is emancipated.
- b. The institutional Office of Research Resources, sponsoring investigator and Department Chairperson must also authorize the participation of a minor in writing. Authorization will be granted only for TTUHSCEP-sponsored or other recognized sponsored educational programs.
- c. Attachment A – Minors in Laboratories Consent/Signature Sheet of this policy shall be

completed and provided by the sponsoring investigator/Department to Safety Services or designee for approval prior to commencing the laboratory study or work experience. The original for each completed Attachment A will be forwarded to the Office of Research Resources for final authorization by the VPR or designee. Copies will be maintained by the Offices of Research Resources and Safety Services, and the original will be returned to, and maintained by the sponsoring Department/investigator.

4. **Training Requirements**

- a. All minors authorized to participate in laboratory study or work experiences must complete the following training programs prior to commencing the study or work experience:
 - (1) TTUHSCEP New Employee Safety Orientation Program (NESOP), Safety Training and Education Program for Students (STEPS), or Volunteer Orientation Program, as appropriate;
 - (2) TTUHSCEP Laboratory Safety Training ;
 - (3) Site-specific safety orientation training (conducted by the sponsoring laboratory).

5. **Authority Invoked by TTUHSCEP OPs**

- a. Should there occur at any time a conflict between this policy and the policy or procedure as reflected in documents of a higher authority that is more restrictive (e.g. Regents' Rules, federal law, or state law), the policy or procedural document of the higher authority will prevail.
- b. Should there occur at any time a conflict between this policy and the policy or procedure of any other written or oral policy statement developed by an operating unit at TTUHSCEP, this policy will prevail.

6. **Disclaimer Statement.** TTUHSCEP reserves the right to interpret, change, modify, amend or rescind any policy in whole or in part at any time without the consent of employees.